

July 29, 1997

Mr. R. L. Wolfinger
High Desert Power Project LLC
250 West Pratt Street
Baltimore, MD 21001-2423

Dear Mr. Wolfinger:

The California Energy Commission (Energy Commission) staff has completed its data adequacy review of the High Desert Power Project Application for Certification (AFC) (97-AFC-1), submitted June 30, 1997. I have determined that the AFC does not contain all the information required by Cal. Code of Regs., tit. 20, § 1704, Appendix B. Attachment A contains an overview of whether each technical discipline evaluated is adequate or inadequate. Attachment B contains staff's detailed data adequacy worksheets which describe staff's finding for each data adequacy regulation.

At the Energy Commission's business meeting on August 13, 1997, I will be recommending that the Energy Commission not accept the AFC until all the additional information specified in Attachment B is supplied. As we agreed at the July 22, 1997, workshop, staff will review draft submittals received by August 7, 1997, and, where possible, will be prepared to advise the applicant and Energy Commission at the August 13, 1997 business meeting on whether the submittals eliminate any data inadequacies described in Attachment B. Pursuant to Cal. Code of Regs., tit. 20, § 1709 (c), if the Energy Commission accepts my recommendation, the Energy Commission shall indicate, in writing, those parts of the AFC which fail to meet the information requirements and the manner in which it can be made complete.

When the applicant submits all of the additional data needed to complete the application, Cal. Code of Regs., tit. 20, § 1709 (d) specifies that the Energy Commission shall determine, within 30 days of receipt of the data, whether the data is sufficient to make the application complete. Per your request at the July 22, 1997 workshop and staff's letter of July 23, 1997, staff will review draft submittals which contain portions of the information required to make the AFC complete. As time permits, staff is also prepared to advise you on whether these draft submittals are complete. Once the applicant believes it has submitted all of the information necessary to make the application complete, it should advise staff that it has done so, and staff will schedule the issue for consideration at the next bi-weekly scheduled business meeting. However, please be advised that the AFC can not be considered complete until the Commission receives 125 copies of the new information [Cal. Code Regs., tit. 20, § 1706 (d)], and that depending upon the detail and complexity of the filings, staff and other parties may require the full 30 days to review the submittals. The application shall be deemed filed, and the processing of the application shall begin, on the date when the Energy Commission determines the application complete.

Mr. R. L. Wolfinger
August 11, 1997
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If you have any questions, please call Richard Buell, Staff's Project Manager, at (916) 653-1614.

Sincerely,

Stephen Rhoads
Executive Director

cc: Lisa Richardson, RMI
Allan Thompson
Andrew, Welch, High Desert Power Project Director
Marc D. Joseph, Adams & Broadwell

Attachments

SR:RKB:rkb
FINALDAD.WPD

ATTACHMENT A

**OVERVIEW OF ENERGY COMMISSION STAFF'S
DATA ADEQUACY DETERMINATION**

High Desert Power Project
97-AFC-1

July 29, 1997

**OVERVIEW OF ENERGY COMMISSION STAFF'S
DATA ADEQUACY DETERMINATION
High Desert Power Project**

97-AFC-1
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TECHNICAL AREA	ADEQUATE	INADEQUATE
1. Air Quality		
2. Biological Resources		
3. Cultural Resources		
4. Efficiency		
5. Facility Design		
6. Geological Hazards		
7. Hazardous Material Handling		
8. Land Use		
9. Noise		
10. Paleontologic Resources		
11. Project Overview		
a. Alternatives		
b. Project Description		
c. Demand Conformance		
12. Public Health		
13. Reliability		
14. Socioeconomics		
15. Soils		
16. Traffic and Transportation		
17. Transmission System		
18. Visual Resources		
19. Waste Management		
20. Water Resources		
21. Worker Safety		

ATTACHMENT B

ENERGY COMMISSION STAFF'S List of Data Inadequacies

High Desert Power Project 97-AFC-1

July 29, 1997

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List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Air Quality				
Appendix B (g) (8) (A)	The information necessary for the air pollution control district where the project is located to complete a Determination of Compliance.	pp. 5.12-1 to 59 Section 5.12 Appendix A Appendix Y	No	<p>1. Need to submit all the information in the application required by the district for a determination of compliance analysis.</p> <p>The following information needs are staff's interpretation of the District's Rules and Regulations covering an application's information requirements. The applicant should verify with the district whether more or less information is needed.</p> <p>2. Need to submit vendor data for each of the turbines and control systems considered. These data could be emission test data, source test data, vendor guarantee data, or any other vendor supplied information that substantiates the emissions tabulated in Tables A-10, A-12, and A-14 in the Appendix A.</p> <p>3. Need to submit a Compliance Certification that certifies that all major stationary sources located in California that are owned by the applicant are operating in compliance with all applicable emission limitations and standards under the Clean Air Act and State Implementation Plan approved by the Federal Environmental Protection Agency (EPA).</p> <p>4. Need to provide sufficient information to demonstrate that adequate emission reduction credits will be achieved to offset the new emissions from this facility. This information may include:</p> <p style="padding-left: 20px;">a. Methods to be used to achieve the</p>

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				nitrogen oxides (NO _x) emission reductions from the Mitsubishi, Riverside and Southwestern cement plants, i.e., by a reduction of fuel consumption, installation of additional control devices, fuel switching, reducing hours of operations, etc..
Appendix B (g) (8) (A) continued			No	<p>b. Source tests or other data to substantiate the claimed emission reductions.</p> <p>c. A letter of intent or other binding agreement with Mitsubishi, Riverside and Southwestern Cement companies.</p> <p>d. Methods to be used to achieve the necessary particulate matter less than ten microns (PM10) emission reduction credits described as a combination of PM10 emission reduction credits (ERCs) and through the reduction of unpaved roads.</p> <p>e. A letter of intent or other binding agreement, and schedule to acquire emission reduction credits with each of the PM10 ERC owners.</p> <p>f. A detailed description of the location and methods to be used to reduce unpaved roads and a schedule for the work to be done.</p> <p>g. Letter of intent or other binding agreement to purchase the emission reduction credits from George Air Force Base.</p> <p>h. Rule 1302 (C)(3)(b)(ii) prohibits the use of emission reduction reductions as offsets if those reductions are the result of shut down of emission units which are not contemporaneous with the creation of the offsets, and EPA has disapproved the applicable implementation plan for the District. Therefore, the applicant needs to provide documentation that emission</p>

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				reductions achieved from the shut down of George Air Force Base are included in the SIP and are approved by the EPA. Note that adjustment may be made to the available emission reductions from the shutdown of George Air Force Base using Reasonably Available Control Technology (RACT) and the 5 percent discount for air quality benefit as required by Rule 1404.
Appendix B (g) (8) (A) continued			No	i. A detailed description of the location, and quantity available for each source of offsets from the South Coast air basin. These may include letters of intent or other binding agreements to purchase of such offsets with each owner of the offset sources. 5. Need to provide an analysis of impacts on visibility in any Class I Areas such as Cucamonga Wilderness, San Geronio Wilderness, and San Gabriel Wilderness, all of which are located within 60 miles from the project site [Rule 1302].
Appendix B (g) (8) (J) (ii)	Potential offset sources, including location, and quantity of emission reductions; and	pp. 5.12-58 to 59 Section 5.12.6	No	The location of each road segment and quantity of offsets from the reduction of unpaved roads.
Appendix B (g) (8) (K)	A topographic map containing contour and elevation data, at a scale of 1:24,000, showing the area within 6 miles of the power plant site.	pp. 5.12.10 to 15 Section 5.12.3.2.2	No	A readable topographical map to 1:24000 scale.
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	pp. 7.0-11 Section 7.0	No	The application should contain a description of how the project will conform with the Prevention of Significant Deterioration (PSD) requirements including any preconstruction monitoring and increment

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				analysis.
Biological Resources				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Pg. 5.3-27 thru 5.3-33 §5.3.7.1 thru 5.3.8	No	Provide a discussion of the potential impacts on riparian and aquatic habitats in the Mojave River near the High Desert Power Project due to project use of treated discharge water from the Victor Valley Wastewater Reclamation Authority treatment plant. Proposed mitigation for any identified impact must also be discussed, as well as any monitoring program to verify the effectiveness of the mitigation.
Appendix B (g) (13) (A)	A regional overview and discussion of biological resources, with particular attention to sensitive biological resources near the project, and a map at a scale of 1:100,000 (or some other suitable scale) showing their location in relation to the project.	Pg. 5.3-4 §5.3.4.1	No	<p>The regional overview and discussion includes vegetation and plant communities, but omits any discussion of the faunal component of the region surrounding the proposed power plant. Provide a discussion that includes animal life.</p> <p>A more detailed discussion of the Mojave River riparian and aquatic habitats which are in the vicinity of the project should be provided. The value of this resource to the region should be discussed and project (including ancillary facilities) related impacts, if any, should be identified.</p>
Appendix B (g) (13) (B)	A discussion and detailed maps at a scale of 1:6,000, of the biological resources at the site of the proposed project and related facilities, and in areas adjacent to them, out to a mile from the site and 1000 feet from the	Pg. 5.3-5 thru 5.3-27 §5.3.4.2 thru 5.3.6 Appendices L & M	No	Please expand on the discussion of biological resources in proximity to the project's linear facilities corridors by including the land from the edge of the identified corridors out to 1000 feet.

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	outer edge of linear facility corridors. Include a list of the species actually observed and those with a potential to occur. The discussion and maps shall address the distribution of community types, denning or nesting sites, population concentrations, migration corridors, breeding habitats, and the presence of sensitive biological resources.			
Appendix B (g) (13) (D)	A discussion of all permanent and temporary impacts to biological resources from site preparation, construction activities, and plant operation. Discussion of impacts must consider impacts from cooling tower drift, and from the use and discharge of water during construction and operation. For facilities which use once-through cooling or take or discharge water directly from or to natural sources, discuss impacts resulting from entrainment, impingement, thermal discharge, effluent chemicals, type of pump (if applicable), temperature, volume and rate of flow at intake and discharge location, and plume configuration in receiving water.	Pg. I-17 Appendix I	No	Cooling tower drift impact discussion should include whether potential impacts on vegetation and/or fauna are anticipated. A discussion should identify whether or not biological resources will be negatively affected by project operation based on the constituents in the drift and the vegetation and/or fauna subject to drift deposition. If measurable impacts are predicted, a monitoring program should be developed for implementation.
Appendix B (g) (13) (G)	A discussion of native fish and wildlife species of commercial and/or recreational value that could be impacted by the project.		No	The application should discuss if any native species of commercial or recreational value are utilized in the vicinity of the project and could potentially be impacted. We suggest the application include results of contacts and/or interviews with fish and wildlife

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				agencies and local sportsmen's groups.
Appendix B (g) (13) (H) (iii)	Species or habitats identified by legislative acts as requiring protection.		No	A section needs to be added addressing whether or not areas of critical concern that have been identified by legislative acts exist in the region surrounding the project and its ancillary facilities
Efficiency				
Appendix B (i) (4) (F)	A discussion of alternative generating technologies available for the project, including the projected efficiency of each, and an explanation why the chosen equipment was selected over these alternatives.	§ 6.2, pp. 6.2-1 through 6.2-2	No	What other power cycles and prime movers were considered? Why were the proposed cycles and machines selected?
Hazardous Materials Handling				
Appendix B (g) (10) (A)	A list of all materials used or stored on-site which are hazardous or acutely hazardous, as defined in Title 22, California Code of Regulations, § 66261.20 et seq., and a discussion of the toxicity of each material.	5.8-15, Section 5.8	No	Information must be provided regarding the toxicity of the materials listed in Tables 5.8-3 and 5.8-4. Standard material safety data sheets are sufficient to satisfy this requirement and could be provided in an appendix.
Appendix B (g) (10) (E)	The protocol that will be used in modeling potential consequences of accidental releases that could result in off site impacts. Identify the model(s) to be used, a description of all input assumptions, including meteorological conditions. The results of the modeling analysis can be submitted after the AFC is complete.	5.8-14 Section 5.8	No	A protocol must be provided which: 1) specifies the use of an EPA approved model that is capable of estimating dispersion by neutral density dispersion; 2) uses 1 meter per second wind speeds and F stability; and 3) specifies a temperature of 90 degrees F for determination of the evaporation rate from the pool caused by the spill; and 4) assume a pool area resulting from a spread to 1 centimeter of depth for spills outside of containment.
Appendix B	A discussion of whether a Risk	5.8-11 Section 5.8	No	The existing Risk Management Prevention

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
(g) (10) (F)	Management Prevention Plan (Health and Safety Code § 25500 et seq.) will be required, and if so, the requirements that will likely be incorporated into the plan.			<p>Plan (RMPP) program has now been replaced by a new Risk Management Program (RMP) which incorporates the requirements of this new federal program. The level of the requirements applicable under the new program can not be precisely determined at this time as they are now based on the outcome of an off-site consequence analysis which will occur in the discovery process. However, the applicant should discuss whether it believes the RMP 1, 2, or 3 requirements will apply to the project, the reasons supporting that conclusion, and summarize the applicable requirements.</p> <p>Depending on final design of the project, staff believes that the facility may be required to comply with either Program 1 or Program 2 requirements. Program 1 will require registration of processes involving use of listed hazardous materials, an analysis of worst case release scenario, a five year accident history, ensure that facility emergency response are coordinated with local agencies, and certify that the facility will not result in any impact on the nearest public receptor. If the facility cannot so certify, it is required to comply with Program 2, which will also require it to develop a safety management program, implement Program 2 prevention steps, develop and implement an emergency response program and submit data on prevention program elements.</p>
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards,	5.8-2 Sections 5.8, 7.0	No	Change the listing of the RMPP in Table 5.8-1 under <u>Federal</u> to RMP, with the citation

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;			Title 40 CFR, Section 68.150 et seq. In Table 5.8-1 under <u>Federal</u> list the Emergency Planning Notification requirement with the citation currently provided for the RMPP.
Land Use				
Appendix B (g) (3) (A)	A discussion of existing land uses and current zoning at the site, land uses and land use patterns within one mile of the proposed site and within one-quarter mile of any project-related linear facilities. Include:	Sections 5.5.4 and 5.5.5	No	Please provide a discussion of existing land uses and zoning within proposed linear facilities corridors (e.g 1/4 mile on each side of proposed location).
Appendix B (g) (3) (A) (ii)	A discussion of any trends in recent zoning changes and potential future land use development;	Sections 5.5.4 and 5.5.5	No	Submittal does not discuss development trends. A discussion of development trends should include an identification of local planning efforts (e.g specific or community plan updates, preparation of specialized ordinances, preparation of special topics plans, subdivision map activity).
Appendix B (g) (3) (A) (iii)	Identification of all discretionary reviews by public agencies initiated or completed within 18 months prior to filing the application for those changes or developments identified in subsection (g)(3)(A)(ii); and	None	No	The information specified in Appendix B (g)(3)(A)(ii) and (g)(3)(A)(iii) within one mile of the proposed site and 1/4 mile on each side of all linear facilities is required.
Appendix B (g) (3) (A) iv)	Legible maps of the areas identified in subsection (g)(3)(A) potentially affected by the project, on which	Figures 5.5-1, 5.5-2, 5.5-3	No	Please provide a map(s) that presents a delineation of existing land uses, zoning, or specific plan designations, for all of the

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	existing land uses, jurisdictional boundaries, general plan designations, specific plan designations, and zoning have been clearly delineated.			proposed linear facilities.
Appendix B (g) (3) (B)	A discussion of the compatibility of the proposed facilities with present and expected land uses, and conformity with any long-range land use plans adopted by any federal, state, regional, or local planning agency. The discussion shall identify the need, if any, for variances or any measures that would be necessary to make the proposal conform with permitted land uses	Sections 5.5.4 and 5.5.5	No	Information provided to comply with Appendix B (g)(3)(ii) and (g)(3)(iii), will be sufficient to meet the requirements of this section.
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	Section 7.0	No	The submittal cites the sources in which laws, ordinances, rules and standards are contained, but needs to identify specific requirements that are applicable to this project.
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).	Section 7.0	No	Please provide a discussion of the project's conformance with all identified laws, ordinances, rules and standards.
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to obtain such permits.	Section 7.0	No	At the workshop on July 22, 1997, the applicant explained that a conditional use permit would not be required. The text in the application should be changed to clarify that a conditional use permit would not be

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				required.
Noise				
Appendix B (g) (4) (B)	A description of the ambient noise levels at those sites identified under subsection (g)(4)(A) which the applicant believes provide a representative characterization of the ambient noise levels in the project vicinity, and a discussion of the general atmospheric conditions, including temperature, humidity, and the presence of wind and rain at the time of the measurements. The existing noise levels shall be determined by taking noise measurements for a minimum of 25 consecutive hours at a minimum of one site. Other sites may be monitored for a duration at the applicant's discretion during the same 25-hour period. The results of the noise level measurements shall be reported in L_{eq} (equivalent sound or noise level), L_{dn} (day-night sound or noise level) or CNEL (Community Noise Equivalent Level) in units of dB(A). The L_{10} , L_{50} , and L_{90} values (noise levels exceeded 10 percent, 50 percent, and 90 percent of the time, respectively) shall also be reported.	§ 5.1.3, § 5.1.4 and § 5.1.5	No	The application should identify whether or not there are sites identified under subsection (g)(4)(A), where the proposed project, including related facilities such as the transmission line and water supply pipeline, would potentially increase existing background levels by 5 dB(A) or more during either construction or operation. This may be shown by providing a revised Figure(s) 5.1-1 showing the 5 dB(A) contours for construction and operation. If this analysis shows that sites exist where noise may potentially increase by 5 dB(A) or more, the application should also include, as a minimum, a noise survey taken for a minimum of 25 consecutive hours at a minimum of one site, as prescribed by Appendix B (g) (4) (B).
Appendix B (g) (4) (E)	An estimate of the project noise levels within the project site boundary during both construction and operation and the impact to the workers at the site due to the estimated noise levels.	§ 5.1.5, Table 5.1-4	No	Please provide estimates of the impact on workers of the estimated noise levels during plant construction and operation.
Project Overview				

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Cal. Code Regs., tit. 20, § 1704 (4)	Each principle subject area covered in a notice or application shall be set forth in a separate chapter or section, each of which shall identify the person or persons responsible for its preparation.	Section 5.0	No	The application needs to contain a list of preparers for each section.
Cal. Code Regs., tit. 20, § 1707)	Every notice and application shall be dated and signed by each applicant attesting under penalty of perjury to the truth and accuracy of such notice or application. ...	Cover Page	No	The application submittal letter needs to be revised to contain and an attestation to the truth and accuracy of the application under penalty of perjury.
Appendix B (a) (3) (C)	A description of the legal relationship between the applicant and each of the persons or entities specified in subsections (a)(3)(A) and (B).	Section 1.0 Section 3.0	No	Although the application identifies that, for example, Southern California Edison will construct the transmission line, the application needs to describe the legal relationship between the applicant and each of the persons or entities specified in subsections (a)(3)(A) and (B).
Appendix B (b) (1) (A)	Maps at a scale of 1:24,000 (1" = 2000'), along with an identification of the dedicated leaseholds by section, township, range, county, and county assessor's parcel number, showing the proposed final locations and layout of the power plant and all related facilities;	Figure 1.1-1 etc.,	No	The application contains maps based on USGS 1:24,000 Adelanto, Helendale, Victorville and Victorville NW Maps, RMI 1997, but the maps have been photographically reduced in size (and scale) for use in the application. However, Cal. Code Regs., tit. 20, § 1704 (b) states that, "applicants may provide maps at a different scale if the maps are legible and if a written explanation of why this different scale is more appropriate is included in the notice or application." Either maps at the scale of 1:24,000 should be provided, or an explanation of why the different scale is appropriate. Please provide a new Figure 1.1-1 at full scale and size (a fold out map in a pocket is acceptable) and provide a

List of High Desert Power Project (97-AFC-1) Data Inadequacies

SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				written explanation of why the photographically reduced scale is appropriate for other maps contained in the application.
Appendix B (b) (1) (C)	A detailed description of the design, construction and operation of the facilities, specifically including the power generation, cooling, water supply and treatment, waste handling and control, pollution control, fuel handling, and safety, emergency and auxiliary systems, and fuel types and fuel use scenarios; and	Sections 3.3, 3.4 and 3.6	No	The application needs to include a detailed description of the design, construction and operation of the Victor Substation. Also provide the information required for all technical disciplines in Appendix B (g) and (i).
Appendix B (b) (1) (D)	A description of how the site and related facilities were selected and the consideration given to engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, electric transmission constraints, and any other factors considered by the applicant.	Page 6.0-1, 6.1-1, 6.2.1 to 6.2-2, and 6.3-1 Section 6.0, et seq.	No	The discussion does identify four criteria used by the applicant in site and facility selection, but needs to specifically identify other site locations considered, and provide a detailed discussion of the engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, and electric transmission constraints, identified for the proposed site and alternatives.
Appendix B (b) (2) (A)	Maps at a scale of 1:24,000 of each proposed transmission line route, showing the settled areas, parks, recreational areas, scenic areas, and existing transmission lines within one mile of the proposed route(s);	Figure 6.4-2	No	Same as the inadequacy identified for (b) (1) (A).
Appendix B (c)	In a section entitled, "Demand Conformance" provide a discussion explaining how the proposed project conforms with the requirements of Public	Page 2.0-1 Section 2.0	No	The application discusses the Notice of Intention (NOI) exemption, but the NOI exemption does not address demand conformance nor can it be used as the basis for

List of High Desert Power Project (97-AFC-1) Data Inadequacies

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	Resources Code § 25524 or Public Resources Code § 25540.6(a)(5). If the provisions of Public Resources Code § 25523.5 are applicable, explain how the project conforms with the requirements of this section. Additional data adequacy requirements may be contained in the Electricity Report applicable pursuant to Title 20, California Code of Regulations, § 1720.5.			complying with the demand conformance requirement. However, based on information provided in other sections of the application, the project is likely to meet demand conformance criteria by virtue of being a merchant plant (neither owned by a utility nor by an affiliate selling to its affiliated utility) of a size less than 3,290 MW (see the 1994 Electricity Report (ER 94) demand conformance need test pp. 133-4). If such an analysis were included in the application, it would meet the need conformance criteria. In any case, the application needs to include a discussion of one or more of the relevant demand conformance criteria (ER 94 pages 133-138) and demonstrate how the project meets the relevant criteria.
Appendix B (e) (2)	A discussion of how facility closure will be accomplished in the event of premature or unexpected cessation of operations.	Page 3.9-1 Section 3.9	No	The application should include a discussion of plans to address premature or unexpected cessation of operations.
Appendix B (f) (1)	A discussion of the range of reasonable alternatives to the project, or to the location of the project, including the no project alternative, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and an evaluation of the comparative merits of the alternatives. In accordance with Public Resources Code section 25540.6(b), a discussion of the applicant's site selection criteria, any alternative sites	Page 6.0-1, 6.1-1, 6.2.1 to 6.2-2, and 6.3-1 Section 6.0, et seq.	No	The alternatives identified are incompletely described. For each alternative identify: site locations considered, and provide a detailed discussion of the engineering constraints, site geology, environmental impacts, water, waste and fuel constraints, and electric transmission constraints, identified for the proposed site and alternatives.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	considered for the project, and the reasons why the applicant chose the proposed site.			
Appendix B (f) (2)	An evaluation of the comparative engineering, economic, and environmental merits of the alternatives discussed in subsection (f)(1).	Page 6.0-1, 6.1-1, 6.2.1 to 6.2-2, and 6.3-1 Section 6.0, et seq.	No	The application does not contain any comparative engineering, economic or environmental merits of the alternatives considered. The application needs to identify the relative merits of the alternatives or provide information on which these alternatives could be judged to lessen or avoid significant environmental impacts relative to the impacts resulting from the proposed project.
Public Health				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	5.0-3, 5.12-7 TO 5.12-35	No	Discussion of the potential for exposure to the toxic products of gas combustion in the turbines proposed. Such emissions were quantified in Appendix A only in terms of volatile organic compounds (VOC) emissions in lbs/hr and tons/year. Emission rates should be provided in the Public Health section for the individual air toxic contaminants involved. This information should then be used for the air dispersion modeling needed to assess the potential contribution of the project to the toxic air pollution burden in the area.
Appendix B (g) (9) (A)	A list of all toxic substances emitted by the project under normal operating conditions, which may cause an adverse public health impact as a result of acute, chronic, or sub-chronic exposure and to which members of the public may be exposed. This list should include, at a	5.12-1 TO 5.12-6. APPENDIX A	No	A listing of the individual components of all toxic, combustion-related VOCs with the potential for health effects.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	minimum, any pollutants emitted by the project that are listed pursuant to Health and Safety Code § 25249.8.			
Appendix B (g) (9) (B)	A protocol describing the analysis which the applicant will conduct to determine the extent of potential public exposure to substances identified in subsection (g)(9)(A) resulting from normal facility operation. The analysis itself can be submitted after the AFC is complete.	5.12-6 TO 5.12-35	No	Protocol describing the air dispersion modeling needed in the Public Health section to establish the possible extent of public exposure to all project-related toxicants of potential public health significance.
Appendix B (g) (9) (C)	A map at a scale of 1:24,000, showing all terrain areas exceeding the elevation of the stack within a 10 mile radius of the facility.	5.8-19 TO 5.8-24	No	The map presented in the Air Quality section (to assess the acceptability of exposure to criteria pollutants) would not serve the same purposes in the Public Health section with regard to toxic non-criteria pollutants. Therefore, a similar map should be provided in the Public Health section which should also discuss the effects of toxic air pollutants. With neither listing nor discussion of the potential effects of project-related air toxics in the Public Health section, there is no showing of the applicant's intention to conduct the types of analyses necessary to support any claims of insignificance with regard to such toxic emissions.
Appendix B (g) (9) (D)	A map at a scale of 1:24,000, showing the distribution of population and sensitive receptors within the area exposed to the substances identified in subsection (g)(9)(A).	5.8-19 TO 5.8-24	No	A map at a scale of 1: 24,000 in the Public Health section along with a discussion of the types of toxic substances to which sensitive receptors would be exposed.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (9) (E)	An analysis of the level of human exposure to substances identified in subsection (g)(9)(A) during normal operating conditions. Include a map at a scale of 1:24,000, showing the location of the three areas of highest impact for each substance.	5.8-19 TO 5.8-24	NA	Note: This section of the regulations is in conflict with Appendix B (g) (9) (B), which requires a protocol for the analysis required by this section of the regulations. Appendix B (g) (9) (B) also states that the analysis need not be provide until after the application is complete. Staff only proposes to require the protocol, which is the lesser of the requirements.
Appendix B (g) (9) (F)	An evaluation of all significant adverse health impacts caused by acute, chronic, and sub-chronic exposure to the substances identified in subsection (g)(9)(A) on both the general population and on the sensitive receptors identified in subsection (g)(9)(D). Describe the relationship between exposure levels and adverse effect.		NA	Note: This section of the regulations is in conflict with Appendix B (g) (9) (B), which requires a protocol for the analysis required by this section of the regulations. Appendix B (g) (9) (B) also states that the analysis need not be provide until after the application is complete. Staff only proposes to require the protocol, which is the lesser of the requirements.
Appendix B (h) (1) (A)	Tables which identify laws, regulations, ordinances, standards, adopted local, regional, state, and federal land use plans, and permits applicable to the proposed project, and a discussion of the applicability of each. The table or matrix shall explicitly reference pages in the application wherein conformance, with each law or standard during both construction and operation of the facility is discussed;	5.12-3 TO 5.12-6	No	Information in the Public Health Section specifically addressing regulations, and rules on the emission of (non-criteria air toxic pollutants from identifiable sources. The tables provided in the Air Quality section deal only with emission of criteria pollutants.
Appendix B (h) (1) (B)	Tables which identify each agency with jurisdiction to issue applicable	5.12-3 TO 5.12-5	No	Information in the Public Health section specifically identifying the permits

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	permits and approvals or to enforce identified laws, regulations, standards, and adopted local, regional, state and federal land use plans, and agencies which would have permit approval or enforcement authority, but for the exclusive authority of the commission to certify sites and related facilities.			required by the Air Pollution Control District for compliance with its rules limiting emission of non-criteria air pollutants.
Appendix B (h) (2)	A discussion of the conformity of the project with the requirements listed in subsection (h)(1)(A).		No	A discussion of project conformity with Air District rules specifically aimed at emission of air toxics from identifiable sources.
Reliability				
Appendix B (i) (3) (B) (ii)	The demonstrated or anticipated feasibility of the technologies, systems, components, and measures proposed to be employed in the facilities, including the power generation system, the heat dissipation system, the water supply system, the reinjection system, the atmospheric emission control system, resource conveyance lines, and the waste disposal system;	§ 3.4, pp. 3.4-1 through 3.4-37; § 3.7, pp. 3.7-1 through 3.7-6	No	Explain why it is expected that the major equipment selected (gas turbines, heat recovery steam generators (HRSGs), steam turbines) will perform reliably. You may cite proven track records or applicable manufacturer assurances or guarantees.
Socioeconomics				
Appendix B (g) (7) (A) (iv)	Availability of skilled workers by craft required for construction and operation of the project;	Section 5.6.4.3 Table 5.6-1, 5.6-5	No	The application needs to identify the availability of skilled workers by craft.
Appendix B (g) (7) (B) (ix)	An estimate of the capital cost of the project of the potential impacts on tax revenues from construction and operation of the project.	Sections 5.6.4.1, 5.6.4.7, 5.6.5.1, 5.6.5.2 Table 5.6-9	No	Based on annual payroll and operation and maintenance costs, please provide an estimate of potential impacts on tax revenues from construction and operation of the project.
Soils				

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	5.2-1 to 5.2-17; Figure 3.3-1	No	Describe levels of contamination on the site and ancillary facilities, remediation effort, anticipated timelines and cleanup levels.
Appendix B (g) (15) (C) (iii)	The effect of power plant emissions on surrounding soil-vegetation systems.	Pg. I-17 Appendix I	No	Cooling tower drift impact discussion should include whether potential impacts on soil-vegetation systems are anticipated. A discussion should identify whether or not soil-vegetation systems will be negatively affected by project operation based on the constituents in the drift and the soils and/or vegetation subject to drift deposition. If measurable impacts are predicted, a monitoring program should be developed for implementation.
Traffic and Transportation				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	Section 5.4	No	Provide a discussion of the road system, design capacity, traffic counts, levels of service, etc., relating to roadways within the Southern California International Airport (SCIA) facility and redevelopment area.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Appendix B (g) (5) (B) (i)	Road classification and design capacity;	Section 5.4.4, Figure 5.4-4	No	See comment on Appendix B (g) (1) above.
Appendix B (g) (5) (B) (ii)	Current daily average and peak traffic counts;	Section 5.4.4, Figure 5.4-1	No	See comment on Appendix B (g) (1) above.
Appendix B (g) (5) (B) (iii)	Current and projected levels of service before project development, during construction, and during project operation;	Table 5.4-1	No	See comment on Appendix B (g) (1) above.
Appendix B (g) (5) (C)	A description of any new, planned, or programmed transportation facilities in the project vicinity, including those necessary for construction and operation of the proposed project. Specify the location of such facilities on topographic maps at a scale of 1:24,000.	Section 5.4.4	No	See comment on Appendix B (g) (1) above.
Appendix B (g) (5) (D)	An assessment of the construction and operation impacts of the proposed project on the transportation facilities identified. Include anticipated project-specific traffic, estimated changes to daily average and peak traffic counts, levels of service, and traffic/truck mix, and the impact of construction of any facilities identified in subsection (g)(5)(C).	Section 5.4.4	No	See comment on Appendix B (g) (1) above.
Visual Resources				
Appendix B (g) (6) (D)	A description of the dimensions, color, and material of each major visible component of the project.	Pp.3.4-10, Section 3.4.2.3; p.3.4.33 to 34, Section 3.4.9; pp.5.9-21 & 26, Sections 5.9.5.2.1, 5.9.6.2.1, and 5.9.6.2.2; Figures 3.5-10, 3.5-11.	No	A description of the dimensions of the heat recovery steam generators (HRSGs) and the cooling towers.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
Waste Management				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	5.8 -16 Section 5.8	No	The application mentions the Phase I and Phase II Environmental Site Assessments (ESA) but no conclusions of the reports are provided. If site mitigation has been accomplished please provide documentation. (Cross reference to Appendix B (i)(1)(B)) This is the same deficiency identified in Appendix B (g) (1) under soils.
Appendix B (g) (12) (A)	A Phase I Environmental Site Assessment for the proposed power plant site using methods prescribed by the American Society for Testing and Materials (ASTM) document entitled "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process" (Designation: E 1527-93, May 1993), which is incorporated by reference in its entirety; or an equivalent method agreed upon by the applicant and the CEC Staff that provides similar documentation of the potential level and extent of site contamination.	5.8 - 7 Section 5.8	No	Applicant shall provide copies of the Phase I ESA and succeeding studies. This is the same deficiency identified in Appendix B (g) (1) under soils.
Appendix B (g) (12) (B)	A description of each waste stream estimated to be generated during project construction and operation, including origin, hazardous or nonhazardous classification pursuant to Title 22, California Code of Regulations, § 66261.20 et seq., chemical composition,	5.8-10 through 5.8-18 Section 5.8	No	Provide a description of all waste streams expected to be generated during the project. <u>Typical Waste Streams</u> o Non-hazardous construction waste - scrap wood, plastic, paper,

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	estimated annual weight or volume generated, and estimated frequency of generation.			<p>cardboard, steel, aluminum, concrete, etc.</p> <ul style="list-style-type: none"> o Hazardous construction waste - excess solvents, adhesives, paint, soldering flux, boiler and pipe cleaning solutions, etc. o Empty hazardous material containers - solvent, thinner, caustic, etc. o waste oil and grease o Oily water from floor and yard drains o Used filters o Spent ion exchange resins o Water treatment sludge o Demineralizer regenerant waste o Boiler Chemical cleaning waste o Waste from air emission control equipment o Cooling tower basin sludge o Spent catalysts - e.g., selective catalytic reduction nitrogen oxide (NO_x) control, carbon monoxide o Spent lead acid batteries o Contaminated material from spilled hazardous substances or wastes - may include absorbent, rags, soil, etc. o Hazardous or non-hazardous classification of pond sludge o Brine concentrate o Dewatering sludge cake o Operation and maintenance waste o Turbine compressor cleaning wastes o Heat recovery steam generators (HRSGs) cleaning wastes
Appendix B	A description of all waste disposal sites	5.8 - 16	No	Provide information on hazardous waste

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
(g) (12) (C)	which may feasibly be used for disposal of project wastes. For each site, include the name, location, classification under Title 23, California Code of Regulations, § 2530 et seq., the daily or annual permitted capacity, daily or annual amounts of waste currently being accepted, the estimated closure date and remaining capacity, and a description of any enforcement action taken by local or state agencies due to waste disposal activities at the site.			disposal sites.
Appendix B (g) (12) (D)	A description of management methods for each waste stream, including methods used to minimize waste generation, length of on- and off-site waste storage, re-use and recycling opportunities, waste treatment methods used, and use of contractors for treatment.	5.8 - 10 through 18 Section 5.8	No	Provide a description of all waste management streams minimization methods and re-use and recycling opportunities. The application needs to discuss the management methods for construction waste. If the brine is discharged to the evaporation pond or the pond sludge is a hazardous waste (as they appear to be), the application should describe the permit requirements and restrictions under Resource Conservation and Recovery Act.
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.		No	Applicant can contact John Scandura, Dept. of Toxic Substance Control, Office of Military Facilities. John Scandura, So. CA Branch Chief (310)590-4856 or Sharon Fair (310)590-5913.
Appendix B (h) (4)	A schedule indicating when permits outside the authority of the commission will be obtained and the steps the applicant has taken or plans to take to		No	The schedule for obtaining the hazardous waste identification number.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	obtain such permits.			
Appendix B. (i) (1) (B)	A discussion of any measures proposed to improve adverse site conditions.		No	Applicant should provide information related to the clean-up of the site if applicable. Phase I and Phase II ESAs are required to make an evaluation.
Water Resources				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	5.11-1 through 5.11-19	No	The effects of project demand on the water supply and other users of this source are identified as specified in section (g) (14) (E) (i) below. Please provide a meaningful discussion of what can be done to mitigate these impacts, notwithstanding the stated intent to meet with local water agencies and affected parties to minimize impacts.
Appendix B (g) (14) (A) (i)	All information required by the Regional Water Quality Control Board in the region where the project will be located to apply for: Waste Discharge Requirements; and	Appendix X	No	Provide in the application information that would be contained in a report of waste discharge as identified in Chapter 15 of Division 3 of Title 23 Code of California Regulations
Appendix B (g) (14) (C) (i)	Source of the water and the rationale for its selection, and if fresh water is to be used for power plant cooling purposes, a discussion of all other potential sources and an explanation why these sources were not feasible;	5.11-9 to 5.11-12	No	Please provide a discussion of the criteria for determining how the water supply will be determined considering State Water Resources Control Board Resolution 75-58, regarding use and disposal of inland waters used for powerplant cooling.
Appendix B (g) (14) (C) (ii)	The physical and chemical characteristics of the source and discharge water;	5.11-16; Appendix B	No	Please provide data on the physical and chemical characteristics of the ground water and State Water Project water similar to that provided for the tertiary water

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
				described in Table B-5.
Worker Safety				
Appendix B (g) (1)	...provide a discussion of the existing site conditions, the expected direct, indirect and cumulative impacts due to the construction, operation and maintenance of the project, the measures proposed to mitigate adverse environmental impacts of the project, the effectiveness of the proposed measures, and any monitoring plans proposed to verify the effectiveness of the mitigation.	5.0 - 2 Section 5	No	Records show trichloroethane (TCE) soil contamination and groundwater contamination. The application needs to provide information on mitigation measures to protect workers against possible contaminated site.
Appendix B (g) (11) (A)	A description of the safety training programs which will be required for construction and operation personnel.	3.4 - 23 Section 3 Appendix Q1 & Q2	No	Provide a complete description of employee training, Injury and Illness Prevention Program, fire fighter training.
Appendix B (g) (11) (C)	Provide draft outlines of the Construction Health and Safety Program and the Operation Health and Safety Program, as follows: <div style="margin-left: 40px;">Construction Health and Safety Program:</div> <div style="margin-left: 40px;">* Injury and Illness Prevention Plan (8 Cal. Code Regs., § 1509);</div> <div style="margin-left: 40px;">* Fire Protection and Prevention Plan (8 Cal. Code Regs., § 1920);</div> <div style="margin-left: 40px;">* Personal Protective Equipment Program (8 Cal. Code Regs., §§ 1514-1522).</div> <div style="margin-left: 40px;">Operation Health and Safety Program:</div>	Outline not in application. Outline not in application Outline not in application.	No	Applicant should provide draft outlines for Injury and Illness Prevention Plan & Program, Fire Protection & Prevention Plan, Personal Protective Equipment Program and Fire Prevention Plan.

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SITING REGULATIONS	INFORMATION	AFC PAGE NUMBER AND SECTION NUMBER	ADEQUATE YES OR NO	INFORMATION REQUIRED TO MAKE AFC CONFORM WITH REGULATIONS
	<ul style="list-style-type: none"> * Injury and Illness Prevention Program (8 Cal. Code Regs., § 3203); * Fire Prevention Plan (8 Cal. Code Regs., § 3221); 	<p>Outline not in application.</p> <p>Outline not in application.</p>		
Appendix B (g) (11) (C) Continued	<ul style="list-style-type: none"> * Emergency Action Plan (8 Cal. Code Regs., § 3220); * Personal Protective Equipment Program (8 Cal. Code Regs., §§ 3401-3411). 	<p>Appendix Q1</p> <p>Appendix Q2</p>		
Appendix B (h) (3)	The name, title, phone number, and address, if known, of an official within each agency who will serve as a contact person for the agency.		No	Gene Glendenning, OSHA Consultation, 1901 No. Gateway Blvd., Suite 102, Fresno CA 93727, (209)454-1295